

**William X Nietzsche  
Julie Metcalf Kinney  
c/o 4406 N Mississippi Avenue  
Portland, Oregon [97217]  
503-287-6494**

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF OREGON** FILED 30 APR '19 16:24 USDC-ORP

**PORTLAND DIVISION**

**William X Nietzsche (solely as trustee for  
KRME International Trust),**

**Et al.,**

**3:18-CV-01930-SI**

**Plaintiff/Petitioner,**

**Case No.**

**PLAINTIFF'S MOTION FOR  
DEFAULT JUDGMENT AGAINST  
MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS (MERS)  
(PURSUANT TO FRCP RULE 55)**

**v.**

**FREEDOM MORTGAGE CORPORATION (FMC),**

**Et al.,**

**Defendant(s)/Respondent(s)**

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**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

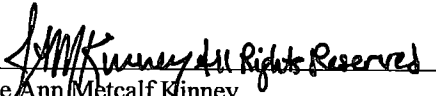
Plaintiff William and Julie Kinney ("The Kinney's"), by and through Plaintiff/trustee William X Nietzsche, hereby moves this Court of Record to enter an order for Default Judgment against defendant Mortgage Electronic Registration Systems, stating in support:


1. On April 5, 2019, defendant Mortgage Electronic Registration Systems received a copy of plaintiff's First Amended Verified Complaint.
2. Defendant Mortgage Electronic Registration Systems had 21 days to file a response to the summons and Verified Complaint.
3. As of this date defendant Mortgage Electronic Registration Systems has failed to file any response to the original summons and Verified Complaint filed November 5, 2018.
4. As of this date defendant Mortgage Electronic Registration Systems has failed to file any response to the First Amended Verified Complaint filed April 2, 2019.
5. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's summons and Verified Complaint served upon defendant Mortgage Electronic Registration Systems.

6. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's First Amended Verified Complaint upon defendant Mortgage Electronic Registration Systems.
7. The interest of justice and of the orderly administration of this court should result in entry of Default Judgment against defendant Mortgage Electronic Registration Systems forthwith.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter an order for Default Judgment against defendant Mortgage Electronic Registration Systems.

RESPECTFULLY DATED this 30 day of April, 2019.

By   
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By   
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]